

03-12499-MLW

EXHIBIT A

DR. JOHN DAIGNAULT
Specializing in Forensic Psychology

Psychological Services, Inc.
222 Forbes Road, Suite 105
Braintree, MA 02184
Telephone (781) 843-8100

P.O. Box 402521
Miami Beach, FL 33140
Telephone (305) 545-5244

Email jdforensicpsi@hotmail.com

AREAS OF CONCENTRATION

Criminal (Adult and Juvenile) - Competency to Stand Trial; Competency to Waive Miranda; Confessional Voluntariness; Criminal Responsibility (Insanity); Diminished Capacity; Aid in Sentencing

Civil - Psychological Injury; Sexual Harassment; Sexual Abuse; Clergy or Other Professional Abuse; Psychologist or Agency Misconduct; Mental Health Commitability; Sexual Dangerousness Commitability; Sex Offender Registry Board (SORB)

Probate and Family Court and Juvenile Court - Custody; Visitation; Parental Capacity; Removal; Sexual Abuse; Competency; Substituted Judgment; Guardianship; Testamentary Capacity; Termination of Parental Rights; Adoption; Attachment

Other Forensic Assessments or Consultations - Workplace Violence; Fitness for Duty; Workers' Psychological Disability; School Violence; Special Education (Autistic Spectrum Disorders; Asperger's Disorder); Residential Treatment; Mental Health; Mental Retardation

EXPERT TESTIMONY AND APPOINTMENTS

Qualified or Testified as an expert witness in over 1500 cases in District, Superior, Probate and Family, and Federal Courts

Appointed by Courts as an independent Guardian *ad Litem* or other examiner in over 200 cases

Appointed by the Court over the past 20 years as the Court Monitor over a residential educational and psychological treatment center

EDUCATIONAL BACKGROUND

Psy.D.

(1983) Baylor University,
Waco, TX. Doctorate in
Clinical Psychology

M.S.W.

(1979) Smith College,
Northampton, MA. Master's degree
in Clinical Social Work

A.B., *cum laude*

(1971) St. Michael's College,
Winooski Park, VT

PROFESSIONAL APPOINTMENTS

Diplomate

American College of Forensic
Examiners, Milwaukee, WI
(1999-present)

Designated & Supervising
Forensic Psychologist

Department of Mental Health,
Boston, MA
(1986 – present)

Clinical Associate

McLean Hospital, Belmont, MA
(1983 – present)

Instructor

Department of Psychiatry,
Harvard Medical School,
Cambridge, MA
(1983 – present)

Consulting Staff

Pembroke Hospital,
Pembroke, MA
(1986 – present)

Consulting Staff

Westwood Lodge Hospital,
Westwood, MA
(1986 – present)

Court Monitor

Bristol County Superior and
Probate Court, Taunton, MA
(1986 – present)

Member, Advisory Panel

Massachusetts 9/11 Fund
(a non-profit organization to assist
families of September 11th victims)
Boston, MA
(2001 – 2003)

Member, Community Access Board

Massachusetts Treatment Center

	for Sexually Dangerous Persons, Bridgewater, MA (1992 – 2000)
Senior Staff	Department of Mental Health, Division of Forensic Mental Health, Boston, MA (1986 – 1994)
Assistant Medical Director	Bridgewater State Hospital, Bridgewater, MA (1983 – 1986)
 <u>PROFESSIONAL EXPERIENCE</u>	
Senior Consultant	Psychological Services, Inc., Braintree, MA, specializing in Forensic Psychology (1991 – present)
Director	Brockton Court Clinic Brockton, MA Employed by: Center for Health and Development, Boston, MA (1986-1994)
Private Practice	Clinical and Forensic Psychology. Plymouth, MA; Brockton, MA (1984-1991)
Consultant	Taunton State Hospital, Secure Care Unit, McLean Health Services Belmont, MA (1988-1989)
Consultant	Treatment Center for Sexually Dangerous Persons, Human Services Cooperative, Cambridge, MA (1988-1989)
Unit Clinical Director and Forensic Psychologist	Bridgewater State Hospital, McLean-Bridgewater Program, (1983-1986)

Instructor	Baylor University, Waco, TX (1981-1982)
Instructor	McLennan Community College, Waco, TX (1980-1981)
Assistant Director	May Institute for Autistic Children, Chatham, MA (1976-1977)
Coordinator of Children's Services	May Institute for Autistic Children, Chatham, MA (1974-1976)
Houseparent	Hampshire Country School Rindge, NH (1973-1974)

TRAINING EXPERIENCE

Clinical Psychology Doctoral Intern	McLean Hospital, Belmont, MA (1982-1983)
Clinical Psychology Doctoral Student	V.A. Medical Center, Waco, TX (1981-1982); Waco Center for Youth, Waco, TX (1980-1981); Heart of Texas MHMR, Waco, TX (1979-1980)
Clinical Social Work Student	McLean Hospital Outpatient Clinic, Belmont, MA (1978-1979); North Central Mass. Mental Health Center Fitchburg, MA (1977-1978)

PRESENTATIONS, PUBLICATIONS, AND CITATIONS

Cited as an "eminently qualified" expert in sexual dangerousness	Commonwealth vs. Edwin Chrichlow, <u>Hamden Superior Court</u> (Velis, J.), Springfield, MA (2004)
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Invited Speaker: "Complex Issues in Murder Cases"	<u>Suffolk University Law School</u> <u>Marcaronis Institute for Trial</u> <u>and Appellate Advocacy,</u> <u>Sponsored with the Flaschner</u> <u>Judicial Institute, 20th</u> <u>Anniversary Advanced Legal</u> <u>Studies, Boston, MA (2002)</u>
"Evaluating Removal in Massachusetts"	<u>Boston Bar Association, Family Law</u> <u>Section, Boston, MA (2002)</u>
Quoted as expert, "Can Trauma Hide in the Back of the Mind"	<u>USA Today, McLean, VA (2002)</u>
"Toward an Appropriate Evaluative Pathway in Removal Cases"	<u>Boston Bar Association,</u> <u>Family Law Section Newsletter,</u> <u>Boston, MA (2001)</u>
"The Insanity Defense: The Richard Sharpe Case"	<u>News Night, New England Cable</u> <u>News, Newton, MA (2001)</u>
"Sexually Dangerous Persons : The Christopher Reardon Case"	<u>Channel 5 News,</u> <u>Newton, MA (2001)</u>
"Sexually Dangerous Persons: The Christopher Reardon Case"	<u>News Night, New England Cable</u> <u>News, Newton, MA (2001)</u>
Invited Speaker: "Assessment Of Sexually Dangerous Persons"	<u>Superior Court, Commonwealth</u> <u>of Massachusetts, Spring Judicial</u> <u>Education Conference, Dedham, MA</u> <u>(2001)</u>
"Violence in the Workplace"	<u>Liberty Mutual, Human Resources</u> <u>Division, Boston, MA (2001)</u>
"Violence in the Workplace"	<u>Boston Bar Association, Labor and</u> <u>Law Division, Boston, MA (2000)</u>
"Who's Benefiting From The Move?: Protecting the Best Interest of The Child"	<u>Massachusetts Bar Association,</u> <u>Continuing Legal Education,</u> <u>Boston, MA (2000)</u>

Cited as an "eminently qualified" expert in sexual dangerousness	<u>Commonwealth vs. Donn Krueger,</u> <u>Middlesex Superior Court</u> (Sosman, J.), Cambridge, MA (2000)
"Forensic Psychology"	<u>Cablevision, Channel 31,</u> <u>"Exploring Psychology",</u> Braintree, MA (2000)
"School Violence"	<u>Thayer Academy, Braintree, MA</u> (1999)
"Children Who Kill"	<u>Patriot Ledger, Quincy, MA</u> (1999)
"School Violence"	<u>Independent Schools Crisis</u> <u>Response Team, Noble and</u> <u>Greenough School, Dedham, MA</u> (1998)
"Recidivism and Treatment of Sex Offenders"	<u>New England Cable News,</u> Newton, MA (1998)
Cited as expert	<u>Lawyers Weekly, Massachusetts</u> <u>Middlesex Superior Court Case</u> <u>No. 94-7544L</u> Medical malpractice case (1998)
"Assessment of Sex Offenders"	<u>News Night, New England Cable</u> <u>News, Newton, MA (1996)</u>
"Assessment of Dangerousness"	<u>Norfolk Probate and Family</u> <u>Court, Dedham, MA (1996)</u>
"Violence Prevention in Schools"	<u>Patriot Ledger, Quincy, MA</u> (1996)
"The Insanity Defense: The John Salvi Case"	<u>News Night, New England Cable</u> <u>News, Newton, MA (1996)</u>
"The Insanity Defense"	<u>News Night with R.D. Sahl,</u> <u>New England Cable News,</u> Newton, MA (1995)

"Jury Sequestration in the
O.J. Simpson Case"

Fox 25 Television Network,
Newton, MA (1995)

"Child Sexual Abuse in Child
Custody Cases"

Committee for Public Counsel
Services and Southeastern
Massachusetts Legal Assistance
Corporation, Taunton, MA (1995)

Cited as expert

Verdictum Juris, California
Superior Court Case No.
594-04-03
Negligence case involving
pastor molesting church
members (1994)

"The Memory of a Victim in
a Sexual Abuse Case"

Massachusetts Bar Association,
Health Law Section, Boston, MA
(1994)

"Forensic Sexual Abuse
Evaluations in the Face of
Custody Conflict"

Children's Hospital, Family
Development Program,
Boston, MA (1994)

"Critical Thinking in Guardian
ad Litem Deliberations"

Faculty, Massachusetts
Association of Guardian
ad Litem,
Dedham, MA (1994)

"Substance Abuse and the Courts"

Panelist, Supreme Judicial
Court Substance Abuse Project,
Brockton, MA (1994)

"Violence in the Workplace"

New England Federal Personnel
Council, Bedford, MA (1994)

"Violence in the Workplace"

Fleet Financial Services,
Springfield, MA (1994)

"Divorce and Family Dynamics"

Bristol Probate and Family Court
New Bedford, MA (1993)

"Rehabilitation of the Sex
Offender"

New England Cable News,
Newton, MA (1993)

"The Forensic Evaluation
of Past Abuse:

Harvard Medical School, Boston,
MA "Ninth Annual Conference on

Ethical and Professional Challenges. The Emergence of a Collective Memory of Past Abuse: Lessons from the Father Porter Case."	Abuse and Victimization in Life – Span Perspective." (1993)
Quoted, "Unlocking Hidden Memories"	<u>U.S. News and World Report</u> , November 29, 1993.
Quoted, "Sins of the Father"	<u>The Boston Globe Magazine</u> , August 29, 1993.
"Working With Your Expert"	<u>Massachusetts Continuing Legal Education, Inc.</u> , Boston, MA "Seminar on Sexual Abuse Damages Actions" (1992)
"Assessment of High Risk in the Workplace"	<u>American PsychManagement/Hurst Association, Inc.</u> , Boston, MA (1992)
"Forensic Assessments and Issues"	<u>Children's Hospital</u> – Family Violence Seminars, Boston, MA (1992)
"Childhood Sexual Abuse"	<u>Plymouth Area Clergy Association</u> , Plymouth, MA (1991)
"Prediction of Violence"	<u>South Shore Mental Health Center</u> , Quincy, MA (1990)
"Guidance for Judges Hearing Grandparent Visitation Cases"	Collaborator to Hon. Ernest Rotenberg, in Ellen Segal and Naomi Karp Eds., <u>Grandparent Visitation Disputes</u> , American Bar Association (1989)

“Forensic Mental Health”
Current Policy and Practice”

Psychology Dept., Southeastern
Massachusetts University, New
Bedford, MA (1987);
Psychiatry Academic, Brockton
Hospital, Psychiatry Rounds,
Westwood Lodge Hospital,
Westwood, MA (1987)

“Administrative Institute Series”
Series”

Faculty, Massachusetts
Association of 766 Approved
Private Schools,
Great Barrington, MA (1987)

“Inpatient Treatment of the
Borderline Personality
Disorder”

Inservice staff training.
Bridgewater State Hospital,
Bridgewater, MA (1984)

“Toward an Understanding of
Countertransference”

Dept. of Psychology,
Baylor University, Waco, TX
(1982)

“Using Milieu Treatment”

Inservice staff training.
Highpoint School, Lenox, MA
(1977)

PROFESSIONAL LICENSES AND AFFILIATIONS

Massachusetts Psychologist License #3620 (1984)
Florida Psychologist License #PY6871 (2004)
Member, American Psychological Association
Member, Massachusetts Psychological Association
Member, Psychology Law Society (Div. 41, APA)
Registrant, National Register of Health Service Providers in
Psychology (1988)

11/04

EXHIBIT B

ON-SITE ACADEMY

Serving Those Who Serve

The Gardner Group
216 Mill Street
PO Box 1031
Gardner, MA 01440-6031

Tel. (978) 632-3518

Fax (978) 630-3987

THE ON-SITE ACADEMY

The On-Site Academy is a non-profit program unique to emergency services and mental health. Borrowing from lessons learned in the treatment of trauma and the tremendous growth in "peer support" self-help groups, it combines technologies as recent as EMDR (eye Movement Desensitization and Reprocessing), and as tested as CISD (Critical Incident Stress Debriefing). The On-Site Academy uses cognitive, psycho-educational, individual and group treatment strategies in a structured residential format.

The residential environment, though a short-term setting, is designed to facilitate safety, sobriety, health, and support foremost. Borrowing from Dr. Judith Herman's belief that recovery from trauma demands those conditions first, the sequence of the treatment and training involves a gradual reconstruction of the event or multiple incidents which brought the officer to the Academy, but which he or she may still find extraordinarily painful to discuss. The final stage of the program involves preparing to "reconnect" with family, friends, and working colleagues and creating a successful follow-through plan.

The On-Site Academy uses the model for debriefing critical incident trauma developed by Jeff Mitchell, Ph.D., but spends a day on each phase, so that officers have the chance during the course of a week to fully debrief their incident. Each phase is done with careful and painstaking attention to detail, to less the impact of the event and accelerate recovery. Because treatment and training are continuous throughout the day and into the evening, material, which has been incompletely resolved in the morning, is often successfully completed in the afternoon.

The treatment process includes a strong education and training component to help officers understand and normalize their reactions to critical incidents. This material was developed from the view of trauma as a bi-phasic, two stage, emotional and physical reaction (George Everly, Ph.D.) which can have a profound effect on an officer's ability to function on the job, or at home. Each morning and afternoon, alternating with debriefing sessions, officers have an hour and a half class on stress and trauma in police work, to help them understand why they feel the way they do.

These educational sessions make extensive use of audio-visual training materials on police stress, post-shoot trauma, and combat stress. If an officer has difficulty giving a voice to his or her own traumatic recollection from the job, sometimes seeing and hearing other officers on film helps "jump start" the process by which material which has been suppressed can be allowed to surface, and be cleared off. In the afternoon, individual and group sessions enable the officer to work through material stimulated during the educational component.

As the week progresses, just as in a classic single contact debriefing, there are high and low points, moments where denial must be dealt with, and where the alliance between clinicians and trained peer support team members makes the difference in outcome. The staff at the On-Site Academy work closely as a team, and includes licensed clinicians, recognized national experts in the field of stress in law enforcement, and advanced-trained, experienced peer support staff who are themselves active in police work.

The educational curriculum is correlated with the stages of a debriefing to maximize therapeutic impact and integration. While officers are in the "fact phase", describing what they actually went through, they are also learning about the physical response to adrenaline and related stress arousal processes in the body. Particular attention is paid to the work of Hans Selye and relationship of the stages of the Generalized Adaptation Syndrome and the "fight or flight" response (Cannon).

As officers are reaching the most difficult part of the week, the "reaction phase", they are also learning about the grief response in emergency services, strategies of peer support for survivors of line of duty death and injury, and resources for survivors such as 'COPS' (Concerns of Police Survivors). The work of Erich Lindemann (grief and mourning), specific peer support manuals from departments with policies which may be of training benefit, and speakers in the peer support movement are featured at this point.

During this middle phase of treatment, by mid-week, individual work of unresolved material related to an officer's critical incident is undertaken using the technique of Eye Movement Desensitization and Reprocessing developed by Francine Shapiro, Ph.D., and pioneered by Roger Solomon, Ph.D., for specific work with line of duty incidents in law enforcement. Concurrently, officers learn about Dr. Solomon's material on the "Dynamics of Fear", with specific emphasis on dealing constructively with vulnerability.

On the fourth day, officers are learning their own signs and symptoms of critical incident stress, consistent with the "symptom phase" of a debriefing in the Mitchell model. In the classroom, they are also learning about Post-Traumatic Stress Disorder. Some of the group participants may be combat veterans. Even if they are not, an understanding of Bessel Van der Kolk's view of PTSD as a "disorder of arousal" is essential to their acceptance of what acute, delayed or cumulative critical incident trauma can do to an officer, especially if untreated.

As the program moves towards graduation, officers develop their own "relapse prevention plan", work on "re-entry" and planning issues, and reconnect with family and colleagues. Hopefully they have gained a new respect for what they do, have integrated their cognition, memory, and affect regarding their trauma, and appreciate themselves as normal people having normal reactions to abnormal events. It is our hope that they can resume healthy and productive careers in their chosen profession and our experience that they do.

Home

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CopShock, Surviving Posttraumatic Stress Disorder (PTSD)

PTSD Treatment Programs

The following on location treatment programs help police officers, firefighters and EMS personnel cope with stress, trauma and the symptoms of PTSD.

West Coast Post-trauma Retreat

4460-16 Redwood Highway, #362,
San Rafael, California 94903

Phone: (415) 721-9789

Web site: www.wcpr2001.org

E-Mail: WCPR2001@aol.com

During a 5-day confidential program, the WCPR helps police officers, firefighters, EMS personnel and members of the military cope with stress and critical incidents. They are staffed with law enforcement and fire service peers, chaplains, and clinicians. The program provides a safe environment for the promotion of healing and education.

On-Site Academy

216-222 Mill Street,
PO Box 1031,
Gardner, Massachusetts 01440-6031

Phone: (978) 632-3518

Web site: <http://users.net1plus.com/gardfire/on-site.htm>

E-Mail: Onsite2@juno.com

The On-Site Academy is a residential 5-day critical incident stress program. The program is for all law enforcement, fire service, and EMS personnel who are overwhelmed by the stress from what they have seen and done. The program is staffed with advanced-trained peers and licensed clinicians from police, fire, and emergency medical services.

Press here to order CopShock

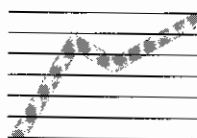
Cover Designer

*Sherry Bryant,
Fine Artist*

*Gifts My Father
Gave Me*

EXHIBIT C

*Applied
Economics
Incorporated*



STATEMENT OF QUALIFICATIONS

DR. RICHARD A. SIEGEL

220 Boylston Street
Chestnut Hill, MA
02467
617.928.0074
FAX 617.928.0177
email: appecon@aol.com

*Applied
Economics
Incorporated*

**QUALIFICATIONS OF DR. RICHARD A. SIEGEL
ECONOMIST**

EDUCATION

A.B., 1953; M.B.A., 1959; Ph.D., 1961. University of California at Los Angeles, Business Administration.

POSITIONS

Economist and President, Applied Economics, Inc.
Boston, MA; 1983-.

Economist, Economics Research Associates.
Boston, MA; 1979-1983.

Economist and President, Richard Siegel Associates.
Boston, MA; 1970-1979.

Economist, Arthur D. Little, Inc.
Cambridge, MA; 1968-1970.

Economist, California Department of Finance.
Sacramento, CA; 1966-1968.

Economist, Bank of America.
San Francisco, CA; 1964-1966.

Assistant Professor of Economics, State University of
New York at Buffalo; 1962-1964.

FIELDS OF WORK

Extensive experience reporting on and testifying to economic damages for lawsuits originating in personal injury and death from accidents, medical malpractice, employment discrimination, and other causes. Measures and testifies to commercial damages.

Specific work includes:

Analysis of value of lost earning capacity
Cost analysis of medical care programs, including life care plans.
Analysis of value of lost household services.
Analysis of value of pensions.

*Applied
Economics
Incorporated*

Appraisal of the value of business firms, stock options, and value of shares of ownership, including partner shares.

Analysis of value of structured settlement proposals.

Analysis of lost sales and profits for business firms.

Assistance with labor union/management negotiations.

Preparation of special studies that require economic analysis.

EXPERT TESTIMONY

Has qualified as an expert witness in court and arbitration proceedings. Has testified as an expert witness in the Boston, Springfield, New Hampshire, and Brooklyn, NY districts of Federal Court; the Probate Court and District Court of Massachusetts; and the Superior Courts of Massachusetts, Rhode Island, New York, and Vermont.

PUBLICATIONS

Many published articles in several fields of economic analysis. Articles have been published in the Massachusetts Lawyers' Weekly, the Western Economic Review, the Journal of The American Institute of Planners, Land Economics, Proceedings of the Western Regional Science Association, Journal of Real Estate Development, National Real Estate Investor, the New England Real Estate Directory, the and other journals.

CONFERENCE PRESENTATIONS

Dr. Siegel has lectured at many conferences on topics related to preparing analyses of economic loss and the cost of medical care. Forums at which he has made presentations include the National Association of Forensic Economics, the Massachusetts Academy of Trial Attorneys, the Massachusetts Bar Association, the Massachusetts Association of City Solicitors and Town Counsels, the National Head Injury Foundation, the Massachusetts Head Injury Association, and The Mealy Company.

TEACHING

Dr. Siegel taught undergraduate and graduate courses at the State University of New York at Buffalo, the State University of California at Sacramento, the American Institute of Banking, and Northeastern University.

MEMBERSHIPS

National Association of Forensic Economics
American Academy of Economic and Financial Experts

CERTIFICATE OF SERVICE

I, James S. Dilday, Esq. attorney for the Plaintiffs, Terri Pechner-James and Sonia Fernandez, hereby certify that I have electronically filed the attached document with the Clerk of the court using the CM/ECF system and by mailing postage prepaid. I also caused to be served upon counsel of record, at the address stated below, by mailing postage prepaid:

Michael J. Akerson, Esq.
Reardon, Joyce & Akerson, P.C.
397 Grove Street
Worcester, MA 01605

Walter Poor, Esq.
Paul Capizzi, Esq.
Office of the City Solicitor
281 Broadway
Revere, MA 02151

/s/ James S. Dilday, Esq.
James S. Dilday, Esq.

Dated: March 27, 2006